

Federal Communications Commission  
Washington, D. C. 20554

Sir:

Below are my comments to the new 47 CFR Part 80 proposed rules changes.

Section III Report and Order; Sub section 2B; para 14:

This paragraph indicates that the requirement for Element 1 no longer will exist. However, Rule 13.201 paras 6 and 7, indicates that the requirement for Element 1 remains. Please clarify. Also, this para indicates that once an individual has pass a certified Coast Guard course, he/she may apply for either RGOL or a GOL. How will this be done? Who will have to submit the application - the individual or the school? And on what form (s)? What will the COLEM's responsibility be?

Sub section 4B; para 30:

This paragraph along with rule 80.1123 indicates that you are re-instituting the requirement for a Compulsory ship to maintain a watch on 2182 kHz. This requirement was deleted effective 1 February 1999. Please note that some ships have already removed the watch receiver. Will they be required to acquire one and install it? If they don't have a 2182 kHz watch receiver, will they no longer be compliant?

Sub Section 9 para 48:

Logs are to be kept IAW with rule 80.409. Will computer generated logs be acceptable in lieu of the old handwritten logs? Storing a disk on a ship is easier than storing a logbook.

Sub section 13; subpart W; Paras 94/95:

Request we re-visit this issue. The DSC Freqs are a ship's only common link to another ship anyway in the world. While GMDSS equipment allows for 2177 kHz to be inserted in memory, most ships do not have this frequency inserted, thereby inhibiting it's use. Plus, this is only useful when ships are close (within Medium Freq range). Also, routine DSC calls take only 7 seconds, while a Distress DSC call takes 35 seconds. Since all GMDSS MF/HF equipment has a scanning watch receiver, the fact that a DSC Controller is busy, WILL NOT inhibit the reception of a Distress. Once the watch receiver hears a Distress and alarms, the GMDSS Operator is required to immediately cancel his routine call and shift his receiver to the corresponding voice frequency to listen for the May Day.

Without the capability to use these common frequencies for routine calling, we are severely limiting the ship's ability to communicate with other ships for business purposes worldwide.

Section IV Sub section 1 paras 109/110:

Since the Recreational Boating Industry is opposed to mandatory formal training on DSC capable equipment, as well as, FCC Licensing (ROL); the use of DSC by these boaters will cause undo stress on the Commercial Ships that have to

respond to the "all ships" calls that will be prevalent. The likelihood of the Recreational Boater having AIS to be able to properly identify the Commercial Ship is very slim. Therefore, if the Recreational Boater wants to call a Commercial Ship, they will have to use the "all ships" calling capability.

Since the requirement for using Channel 16 goes away 1 year after the implementation of Sea Area-A1; The ability of the Recreational Boater to talk to the Commercial Ship will also go away. Therefore, we think it prudent to establish a voice channel for use between the Recreational Boater and the Commercial Ship, in addition to the use of DSC. This should help to minimize the overuse of DSC "All ships" calls.

Sub section B; paras 111-113:

Under the Coast Station Watch section, there is a very serious disconnect between the Coast Radio Stations and the Maritime industry. The Private and Public (less Coast Guard stations) Coast Radio Stations, monitor DSC frequencies. These Coast Station DSC freqs are (1) Half Duplex and (2) are not the same as the six (seven if you include 2177 kHz) DSC freqs that the ships use. Ships CANNOT insert these Coast Station DSC freqs in their GMDSS equipment. The equipment will only allow for the Distress DSC freqs and 2177 kHz. Also, the ships will NOT allow for the insertion of half duplex freqs. The equipment will only allow Simplex freqs.

The only way a ship can contact a Coast Radio Station is to continue to use the existing system (e.g. Free Signals). So, the fact that a Coast Radio Station has DSC is irrelevant to the Maritime Industry. The Coast Radio Stations do not even monitor the Distress DSC freqs, so they are further insulated from assisting the mariner that may be in trouble or needs to communicate through the Coast Station.

Sub section 9; para 115:

This tone could be added to routine DSC calls, thereby further ensuring non-interference between Distress and routine calls using DSC freqs.

Sub section 10; para 122:

The SOLAS requirement is better served by requiring all ships that carry passengers (including the Charter Boat Industry) to have DSC equipment that meets/exceeds the Sea Area A1 and/or A2. DSC transmission will get through when voice transmission will not.

Para 124:

Delete "M", as it does not have Distress capability. Retain A, B and C.

Sub section 11; para 127:

All EPIRBs should be installed outside. Having an EPIRB inside a steel shell will weaken the signal so it may not reach the satellite. Also, by mounting the EPIRB inside, the float free capability is removed.

Reference: 80.1117 and 80.1121 (B - D):

IMO deleted the requirement for Distress Relay using DSC on 1 January 1999. Is the FCC re-instituting this requirement? Or is this requirement only to be used by direction of a Rescue Coordination Center?